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August 8, 2014

Mr. Edward Ryan
Senior Campaign Finance Analyst
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Amended October Monthly Report (09/01/2011-09/30/2011)
FEC ID C00468738

Dear Mr. Ryan:

In response to your communication regarding a Request for Additional Information dated February 21, 2013:

I have reviewed the 2010 and 2011 reports that are the subject of that inquiry. Each of the reports in question was submitted during the tenure of the original treasurer, my immediate predecessor. I have limited records available to be able to determine the precise cause of the change in disclosure from the original reports to the final amendments.

The information I do have available indicates some of the change is a movement from one reporting period to another, as can be seen in the change of total receipts in the 2011 October Monthly and the next reporting period, the 2011 Pre-General. The majority of the changes appear to relate to additional reportable activity of a fundraising agent, which increased both receipts and disbursements as a result of that activity. The original treasurer has already responded that the largest of the changes in question was due to not including credit card transactions for that period and that appears to be intended to describe the impact of the fundraising agent activity.

Based on review of information that is available to me, I believe the final amendments filed by the prior treasurer correctly disclose the activity as it actually occurred. The record shows errors of that magnitude were limited to the earliest period of the PACs existence, and greatly improved in 2012 and 2013.

As treasurer, I believe the circumstances that caused these errors have been rectified by the introduction of internal controls in the form of added reconciliation processes and review procedures. During my tenure as treasurer, beginning August 16, 2013, the committee has had no amendments necessary. This office conducts its processes and procedures in a manner to ensure full and compliant reporting to serve the public's right and need to know such information. All campaign finance compliance personnel in this office have received extensive training internally and each has attended at least one Federal Election Commission campaign finance conference.

Sincerely,

Nancy H. Watkins
Treasurer
